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April 4, 2005

ORIGINAL

Our File No. 20939-0100-60

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APR - 4 2005

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: **Comments In Opposition to Notice of Proposed Rule Making**
Amendment of Section 73.622(b)
Table of Allotments
Digital Television Broadcast Station
(Johnstown and Jeannette, Pennsylvania)
MB Docket No. 05-52
RM-10300

Dear Ms. Dortch:

Transmitted herewith on behalf of Larry L. Schrecongost, licensee of WLLS, Indiana, Pennsylvania, are an original and four copies of his Comments In Opposition to Notice of Proposed Rule Making in the above-referenced matter.

If there are any questions concerning this submission, please contact the undersigned directly.

Sincerely,



John M. Pelkey

Enclosures
JMP:yg

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Amendment of Section 73.622(b),)
Table of Allotments)
Digital Television Broadcast Station)
(Johnstown and Jeannette, Pennsylvania))

MB Docket No. 05-52
RM-10300

To: **Office of the Secretary**

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APR - 4 2005

Federal Communications Commission
Office of Secretary

**Comments In Opposition
to Notice of Proposed Rule Making**

Larry L. Schrecongost, licensee of Class A television station WLLS ("WLLS"), Indiana, Pennsylvania, hereby files his Comments, through counsel, with respect to the above-captioned rule making proceeding. In that proceeding, the Commission, in a *Notice of Proposed Rule Making* released February 17, 2005 (the "2005 NPRM"), proposes to modify the DTV Table of Allotments by deleting DTV Channel 30 from Johnstown, Pennsylvania, and adding DTV Channel 49 to Jeannette, Pennsylvania. WLLS operates as a Class A station on Channel 49, the very channel on which WNPA-DT proposes to operate. Its transmitter is located only 34 miles from the reference coordinates for the proposed WNPA-DT Channel 49 facility. WLLS's protected 74 dBu protected coverage area would be wholly encompassed within the 48 dBu predicted principal community coverage contour of the proposed WNPA-DT facility, with the result that WLLS would be completely compromised and would no longer be able to provide service. This is exactly the type of situation that the Community Broadcasters Protection Act of

1999 (“CBPA”)¹ was designed to prevent and adoption of the proposed rule making would result in a clear violation of that law. As a result, the rule making proposal cannot be adopted.²

I. The Antecedents of the Present Rule Making.

On January 31, 1996, Venture Technologies Group, Inc. (“VTG”), then the licensee of WNPA(TV),³ petitioned the Commission to institute a rule making to delete NTSC UHF Channel 19 from Johnstown, Pennsylvania, to add NTSC UHF Channel 19 to Jeannette, Pennsylvania, and to modify the license of WNPA(TV) to specify operations on Channel 19 in Jeannette, Pennsylvania, in lieu of operation on Channel 19 in Johnstown, Pennsylvania. Jeannette is approximately 35 miles to the west of Johnstown. Whereas Johnstown is in the Johnstown-Altoona DMA, which is the 97th largest DMA in the country, Jeannette is in the Pittsburgh DMA, which is the nation’s 22nd largest DMA.

The VTG petition initially was returned by the Commission as not being acceptable for consideration because the proposal violated the provisions of a freeze then in effect with respect to stations located in the vicinity of Pittsburgh, Pennsylvania. See letter of April 25, 1996, from John A. Karousos, Chief, Allocations Branch, Federal Communications Commission, to Irving Gastfreund, Esq. That freeze had been put in place to stabilize allotments and thus provide the Commission with “reasonable options relating to a conversion to a digital television service.”

¹ Community Broadcasters Protection Act of 1999, Pub. L. No. 106-113, 113 Stat. Appendix I at pp. 1501A-594 - 1501A-598 (1999), codified at 47 US C § 336(f).

² A preliminary matter that needs to be addressed is whether there continues to be any need for the instant rule making. In February of this year, each television licensee with two core channel assignments that were not low VHF channel assignments was required to elect on which channel it would operate after the completion of the digital transition. Viacom Stations Group of Pittsburgh Inc., which currently is the licensee of WNPA(TV), informed the Commission that it would operate on Channel 19 after the digital transition. See BFRECT- 20050209ADA. Viacom did not even mention this pending rule making in its submission. That being the case, there is no longer any need to proceed with the instant rule making.

³ At the time that the Petition for Rulemaking was filed, the station was using the call sign “WTWB-TV.” To avoid confusion, the station will be referred to by its present call signs of “WNPA(TV)” or “WNPA-DT.”

See *Appleton, New London and Suring, Wisconsin*, 10 FCC Rcd 7712, 7713 (1995). Shortly after the dismissal of VTG's Petition for Rulemaking, however, the Commission adopted its *Sixth Further Notice of Proposed Rule Making* in MM Docket No. 87-268 ("*Sixth Further Notice*").⁴ In that *Sixth Further Notice*, the Commission decided that, while it would no longer accept petitions for rule making proposing to amend the TV Table of Allotments to add an allotment for a new NTSC station, it would consider pending petitions and open allocation rule making proceedings "on a case-by-case basis taking into account the impact on the draft DTV table."⁵

In response to the *Sixth Further Notice* and VTG's request for reconsideration of the dismissal of the VTG petition, the Commission issued a *Notice of Proposed Rule Making* in which it, consistent with VTG's petition for rule making, proposed to change WNPA(TV)'s community of license from Johnstown to Jeannette. *Johnstown and Jeannette, Pennsylvania*, MM Docket No. 97-96, 12 FCC Rcd 3195 (1997). On July 18, 1997, the Commission adopted the proposed rule making. *Johnstown and Jeannette, Pennsylvania*, MM Docket No. 97-96, 12 FCC Rcd 10,300 (1997). In doing so, the Commission stated that it had determined that the allotment of Channel 19 to Jeannette, Pennsylvania, would have no impact on the draft DTV Allotment Table because the proposal did not result in a new allotment but merely the reallocation of an existing allotment with no change in the transmitter site. 12 FCC Rcd at 10301. In other words, the proposal was able to circumvent the freeze that normally would have applied to the station because the licensee of WNPA(TV) had stated that it was leaving the transmitter site for the station exactly where it was. Thus, the fact that the DTV Table of Allotments failed to reflect the fact that there had been a change in WNPA(TV)'s community of license from

⁴ 11 FCC Rcd. 10968 (1996).

⁵ *Id.* at 10992.

Johnstown to Jeannette was of no moment since the transmitter site was to be the same regardless of whether the community of license was Johnstown or Jeannette.

More importantly, the Commission's decision to grant the proposed reallocation despite the existence of the freeze because the proposal would result in a mere channel change at the currently-existing transmitter site became crucial to the Commission's adoption of the revised DTV Table of Allotments seven months later. See *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, MM Docket No. 87-26 ("Sixth Report and Order Reconsideration").⁶ At that time, the Commission was able to allocate Channel 29 to Johnstown at the same time that it was allotting Channel 30 to WNPA(TV) precisely because the two facilities were to be essentially co-located.

II. The Present Rule Making Proposal.

On August 25, 1999, that is, approximately two years after the Commission issued its Report and Order in MM Docket No. 97-96 and more than 18 months after the Commission's *Sixth Report and Order Reconsideration* in which the Commission specified that the digital channel paired with WNPA(TV)'s NTSC Channel 19 was allotted to Johnstown,⁷ Paramount Stations Group of Pittsburgh Inc. ("Paramount"), by then the licensee of WNPA(TV), filed a petition for rule making in which it sought to modify WNPA(TV)'s DTV allotment from Channel 30 to Channel 49 and to change the station's digital community of license from

⁶ 11 CR 635, 807 (1998).

⁷ *Id.*

Johnstown to Jeannette. It is this proposal that forms the basis for the Commission's 2005 NPRM.⁸

Paramount never sought reconsideration or review of the *Sixth Report and Order Reconsideration*'s unambiguous allocation of DTV Channel 30 to Johnstown, rather than Jeannette. Instead, Paramount used its petition as a disguise to hide its untimely request for reconsideration that was being filed more than a year too late. Apart from the procedural infirmities of this untimely request, the request is substantively defective inasmuch as it did not attempt, even by way of incorporation by reference of materials submitted by previous licensees, to demonstrate that the public interest would be served by changing the allotment's community of license from Johnstown to Jeannette. On its face, the proposal is contrary to the public interest. The proposal would permit Paramount to abandon Johnstown, a community in the 97th largest DMA, in favor of Jeannette, a community in the 22nd largest DMA. The proposed location for the Channel 49 facility is as close to downtown Pittsburgh as it is to Jeannette and is in fact 37.43 miles from its existing facility. Any increased population that might receive service would be in the already well-served Pittsburgh market, while service would be withdrawn from the Johnstown-Altoona market. Paramount, however, did not even attempt to provide the requisite information, routinely required of proponents in a rule making proceeding, to show that the public interest would be served by the requested change in the community of license.

In addition, of particular importance in light of WLLS's right to protection under the CBPA as discussed below, is the failure of the Paramount petition for rule making even to claim that the present allotment of Channel 30 to Jeannette in any way results in an inability on the part of WNPA(TV) to provide the requisite level of service to Jeannette. Instead, the Petitioner's

⁸ Footnote 1 of the 2005 NPRM indicates that a notice of proposed rule making was adopted on October 18, 2001 in response to the Paramount proposal. A search of the Commission's various databases yields no confirmation that such a notice of proposed rule making was ever released by the Commission.

only claim is that, because of its Channel 30 allocation, WNPA-DT is unable to relocate its facilities to “improve service” to Jeannette.⁹ In point of fact, as is explained in the attached statement of Robert W. Fisher of Third Coast Broadcasting, Inc., the assignment of Channel 30 to WNPA(TV) meets all of the FCC criteria for replicated coverage, interference, city of license coverage and co-location. Thus, this is not a case in which the DTV Table of Allotments needs to be modified because of technical problems. As a result, as will be explained below, federal law forbids the adoption of the proposed rule making.

III. The Proposal Violates the Community Broadcasters Protection Act of 1999.

Shortly after Paramount filed its Petition for Rulemaking and Request for Expedited Action, Congress adopted the CBPA, which was signed into law on November 29, 1999. As the Commission pointed out in its *Report and Order* in MM Docket No. 00-10 in which the Commission established the rules for the Class A service, the purpose of the CBPA was to provide protection to certain low power television stations which, as the Commission explained, often provide service to rural communities.¹⁰ Specifically, the adoption of the CBPA gave certain LPTV stations, known as Class A licensees, “primary” status as television broadcasters.¹¹

Although the CBPA became law in November 1999 and the Commission’s rules implementing the CBPA were released on April 4, 2000, Paramount’s Amended Petition for Rulemaking and Request for Expedited Action filed on May 1, 2000, contained a glaring omission inasmuch as the engineering study submitted as part of that pleading failed to take into account the existence of any LPTV stations that might be eligible for Class A status. This

⁹ Petition for Rulemaking and Request for Expedited Action at p.2.

¹⁰ *Establishment of a Class A Television Service*, MM Docket No. 00-10, 15 FCC Rcd 6355, 6357 (2000), *recon.*, 16 FCC Rcd 8244 (2001).

¹¹ *Id.* at 6357.

omission was significant because, as the Commission explicitly held in MM Docket No. 00-10, Class A stations were only required to protect pending applications for a new DTV station that were on file as of November 29, 1999 and that had completed all processing short of grant as of that date. Obviously, WNPA(TV) had failed to file such an application. Moreover, to the extent that the provisions of Docket No. 00-10 dealing with new DTV allotments came into play, the holding of the Commission was clear: "In a new DTV allotment rule making [as this is], we will require protection of Class A stations."¹² While the Report and Order in 00-10 provided for some flexibility in the re-allotment of DTV channels to correct unforeseen technical problems, that situation does not apply here inasmuch as the Commission's original action in changing WNPA(TV)'s NTSC community of license from Johnstown to Jeannette was premised on the fact that there would be no change in WNPA(TV)'s transmitter site, which is the site that is essentially co-located with a Channel 29 DTV allotment. Of course, adjacent channels can exist in a DTV context if the facilities in question are co-located. Thus, the failure of Paramount to even consider the existence of Class A eligibles meant that Paramount was running the risk that it would be totally unaware that it would be required to provide protection to LPTV stations that became Class A stations. To make sure that Paramount understood that its engineering study was flawed, WLLS contacted counsel for Paramount to alert Paramount to WLLS's existence on Channel 49 at a site just a few miles from Paramount's proposed site. Paramount nevertheless failed to correct its engineering study that it now has before the Commission in support of its rule making request.

Paramount's error in failing to consider the impact of its proposal on Class A eligibles was compounded when it again failed to take possible Class A stations, including WLLS, into account when it amended its proposal on August 14, 2001. That error became dispositive when,

¹² 15 FCC Rcd at 6376.

on February 8, 2002, the Commission awarded a Class A television broadcast station license to WLLS.¹³ The mere possibility that should have been addressed by Paramount by no later than its August 2001 submission had become a reality. WLLS had become a Class A licensee and, as a result, was entitled to protection by WNPA-DT. The proposal advanced by Paramount in this rule making proceeding fails to provide the protection to which WLLS is entitled by virtue of the “primary status” accorded to it pursuant to the CBPA. As is demonstrated in the attached statement of Robert W. Fisher, the proposed Channel 49 facility would completely encompass the coverage area of WLLS, which operates on Channel 49 and is located only 34 miles from the reference coordinates for the proposed WNPA-DT facility. This is not a proposal for a grant where a minor overlap of contours would occur; the proposed WNPA-DT facility, if granted, would simply obliterate WLLS. As a result, Paramount’s proposal violates the CBPA and must be rejected.

The grant of the Paramount proposal is thus contrary to the public interest as evidenced by the action of Congress and the President in codifying the CBPA and by the action of the Commission in adopting the rules and policies implementing the law. The current situation provides a paradigm of the wisdom of the CBPA. WLLS provides precisely the type of service to the small rural area that the CBPA was designed to protect. Granting the Paramount proposal would result in the 14,895 residents of the borough of Indiana, Pennsylvania, and the thousands of additional residents of the surrounding area losing their only local television station. By contrast, Paramount seeks to withdraw service from the relatively small Johnstown-Altoona market so that it can upgrade its facility and become a Pittsburgh station. Weighed against the harm to the public that would be wrought by the elimination of WLLS, such a relocation is

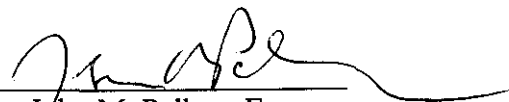
¹³ A copy of the WLLS Class A license and the Public Notice providing notice of the grant of that license are attached hereto.

directly contrary to the public interest and cannot be permitted by the Commission if it is to abide by federal law.

Accordingly, Larry L. Schrecongost respectfully requests that the Commission observe the requirements of the CBPA and not adopt the proposed rule making whereby Paramount seeks to allot DTV Channel 49 to Jeannette, Pennsylvania, but instead preserve the Channel 30 DTV allotment for Johnstown.

Respectfully submitted,

LARRY L. SCHRECONGOST

By: 
John M. Pelkey, Esq.
Garvey Schubert Barer
1000 Potomac Street, N.W.
Fifth Floor, Flour Mill Building
Washington, D.C. 20007-3501

Date: April 4, 2005

Third Coast Broadcasting, Inc.,
Statement Concerning Technical Analysis of
WLLS-CA and the Proposed WNPA-DT Facility

Third Coast Broadcasting, Inc.

Statement Concerning Technical Analysis of WLLS-CA and the Proposed WNPA-DT Facility

Further to the request of WLLS-CA, an analysis of the proposed WNPA-DT channel change from channel 30 to channel 49 has been made with regard to usability of the original channel 19 facility, interference caused and received by the protected Class A station, and the likelihood of a replacement channel for WLLS-CA.

Initially, an analysis was done to determine the usability of the original channel 30 with regard to coverage of the city of license and the ability of the DTV station to replicate the signal of its paired channel 19 facility. Although the original rules required only an analysis of the DTV predicted contour, the rules have since required the showing that the facility complies with a 48 dBu f:50/90 city grade coverage requirement. The original FCC assigned paired channel 30 meets all of the FCC criteria for replicated coverage, interference, city of license coverage, and co-location and is a perfectly usable channel for covering the authorized city of license, Jeannette, PA.

The proposed channel 49 WNPA-DT facility, is proposed in a location and with facilities which would create a contour which would completely encompass the coverage area of WLLS-CA, a protected Class A facility which is licensed to Indiana, Pennsylvania. In this analysis, it is shown that severe interference would be caused from WLLS-CA to the proposed WNPA-DT facility and that WNPA-DT would cause severe interference to WLLS-CA's protected coverage area. Such interference would not be curable and would destroy all of WLLS-CA's coverage. Accordingly, all of the viewers of WLLS-CA would lose their local television service from this proposal.

A channel search was performed for a replacement channel which would cover Indiana PA within the core channel range and no usable replacement channels were found which would provide reasonable coverage. Therefore, the WNPA-DT proposal would cause incurable interference to the currently licensed facilities of Class A station WLLS-CA, Indiana, PA.

Submitted March 24, 2005



Robert W. Fisher
Communications Consultant

WLLS Class A License

United States of America
FEDERAL COMMUNICATIONS COMMISSIONS
CLASS A TELEVISION
BROADCAST STATION LICENSE

Authorizing Official:

Official Mailing Address:

LARRY L. SCHRECONGOST
P.O. BOX 1032
INDIANA PA15701

Hossein Hashemzadeh
Associate Chief
Video Division
Media Bureau

Facility Id: 208

Grant Date: February 08, 2002

This license expires 3:00 a.m.
local time, August 01, 2007.

Call Sign: WLLS-LP

License File Number: BLTTA-20010711AEF

This license converts the facilities of BLTTL-19961230JA to Class A
status.

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Callsign: WLLS-LP

License No.: BLTTA-20010711AEF

Name of Licensee: LARRY L. SCHRECONGOST

Station Location: PA-INDIANA

Frequency (MHz): 680 - 686

Offset: ZERO

Channel: 49

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 74.750 of the Commission's Rules.

Antenna type: (directional or non-directional): Directional

Description: SWR SWLP16EC

Major lobe directions (degrees true): Not Applicable

Antenna Coordinates: North Latitude: 40 deg 37 min 38 sec

West Longitude: 79 deg 12 min 49 sec

Maximum Effective Radiated Power (ERP) Towards Radio Horizon: 21.3 kW

Maximum ERP in any Horizontal and Vertical Angle: 21.3 kW

Height of radiation center above ground: 79 Meters

Height of radiation center above mean sea level: 585.1 Meters

Antenna structure registration number: None

Special operating conditions or restrictions:

- 1 This Authorization reflects the licensee/permittee's certification that the class A television stations will not cause interference to the reception of existing full-service stations on either NTSC or DTV channels, any DTV facilities resulting from maximization applications filed by May 1, 2000, and existing LPTV, television translator and class A television stations.
- 2 Operation with the facilities specified herein is subject to modification, suspension, or termination without right to hearing, if found by the Commission or industry Canada to be necessary in order to conform to the 1994 Canada-USA Television Broadcast Agreement. This facility is classified as a secondary operation with respect to existing and future assignments in Canada. The station is not authorized for international protection by existing or future allotments or assignments on allotted channels in Canada.

*** END OF AUTHORIZATION ***

Report No. 45171, Public Notice Announcing Grant of Class A License for WLLS

REPORT NO. 45171

B R O A D C A S T A C T I O N S

02/13/2002

STATE FILE NUMBER E/P CALL LETTERS
Actions of: 02/07/2002

APPLICANT AND LOCATION

NATURE OF APPLICATION

TV AUXILIARY TRANSMITTING ANTENNA APPLICATIONS FOR MOD OF LICENSE FOR AN AUXILIARY FACILITY GRANTED

MO	BXMLET-20011108AAP	KMOS-TV 4326	BD OF GOVERNORS OF CENTRAL MO. STATE	Mod of License to cover auxiliary
	P	CHAN-6	WARRENSBURG, MO	permit.

TELEVISION APPLICATIONS FOR LICENSE TO COVER GRANTED

TX	BLCT-20010201AEY	KZTV 33079	K-SIX TELEVISION, INC.	License to cover construction
	P	CHAN-10	CORPUS CHRISTI, TX	permit no: BPCT-20000413ABR,
				callsign KZTV.

CO	BLCT-20010330AFD	KTLL-TV 82613	RAMAR COMMUNICATIONS II, LTD.	License to cover construction
	P	CHAN-33	DURANGO, CO	permit no: BMPCT-20010330AFD,
				callsign KTLL.

CA	BLCT-20010420ABS	KMAX-TV 51499	WVIT, INC	License to cover construction
	P	CHAN-31	SACRAMENTO, CA	permit no: BPCT-20000828ACW,
				callsign KMAX-TV.

GA	BLET-20010604ABR	WATC 13206	COMMUNITY TELEVISION, INC.	License to cover construction
	P	CHAN-57	ATLANTA, GA	permit no: BMPET-20000322AAE,
				callsign WATC.

WA	BLCT-20010831ADF	KBKI 84238	BROADCASTING LICENSES, LTD PARTNERSHIP	License to cover construction
	P	CHAN-9	WALLA WALLA, WA	permit no: BMPCT-20010827AAF,
				callsign KBKI.

FL	BLCT-20010910ACH	WBIF 81594	MARIANNA BROADCASTING, INC.	License to cover construction
	P	CHAN-51	MARIANNA, FL	permit no: BPCT-19960404LN,
				callsign WBIF.

AL	BLCT-20010913ABP	WBPB 83943	WBPB LICENSE CORP.	License to cover construction
	P	CHAN-55	GULF SHORES, AL	permit no: BPCT-19960920LU,

ND BLCT-20010914ABC KVRN 55372 RED RIVER BROADCAST CO., LLC
P CHAN-15 FARGO, ND

callsign WBPB.

License to cover construction
permit no: BPCT-20001122AAE,

callsign KVRN.

CA BLCT-20010920ABO KSCI 35608 KSLN, INC.
P CHAN-18 LONG BEACH, CA

License to cover construction
permit no: BMPCT-20010511AAQ,

callsign KSCI.

WI BLCT-20011009ADH WAOW-TV 64546 WAOW-WYOW TELEVISION, INC.
P CHAN-9 WAUSAU, WI

License to cover construction
permit no: BPCT-20010419AAZ,

callsign WAOW-TV.

TELEVISION APPLICATIONS FOR MODIFICATION OF LICENSE GRANTED

VA BMLCT-20010320ACB WUPV 10897 BELL BROADCASTING, L.L.C.
P CHAN-65 ASHLAND, VA

License to modify BLCT-19990908AAP
callsign WUPV.

TV TRANSLATOR OR LPTV STATION APPLICATIONS FOR ASSIGNMENT OF LICENSE GRANTED

NM BALTT-20011212ABG K48GK 11465 CITY OF GALLUP, NEW MEXICO
P CHAN-69 GALLUP, NM

Voluntary Assignment of License
From: CITY OF GALLUP, NEW MEXICO
To: EMMIS TELEVISION LICENSE CORPO
Form 345

Actions of: 02/08/2002

FM TRANSLATOR APPLICATIONS FOR MINOR MODIFICATION TO A CONSTRUCTION PERMIT DISMISSED

CA BMPFT-20011204ABO K290AI 84777 EDUCATIONAL MEDIA FOUNDATION
P 105.9 MHZ NATOMAS, CA

Mod of CP

FM TRANSLATOR APPLICATIONS FOR MINOR MODIFICATION TO A LICENSED FACILITY DISMISSED

VA	BPFT-20011102AAY	W233AA 6129	JAMES MADISON UNIVERSITY BOARD OF VISITOR S	Minor change in licensed f
	P	94.5 MHZ	WINCHESTER, VA	

AM STATION APPLICATIONS FOR LICENSE TO CO VER GRANTED

FL	BL-20011030ADP	WGSR 49214	RJM COMMUNICATIONS, INC	Lic. to cover
	P	1570 KHZ	FERNANDINA BEACH, FL	

AM STATION APPLICATIONS FOR TRANSFER OF C ONTROL GRANTED

NY	BTC-20020124AAB	WABY 4683	DOT COMMUNICATIONS, INC.	Voluntary Transfer of Control
	E	1400 KHZ	ALBANY, NY	From: LORDAD OF ALBANY, L.P.
				To: GALAXY COMMUNICATIONS, L.P.
				Form 316

CLASS A TV APPLICATIONS FOR LICENSE TO CO VER GRANTED

MT	BLTTA-20001208AEU	K18AJ 35453	KPAX COMMUNICATIONS, INC.	Application to convert: BLTTTL -1992
	P	CHAN-18	KALISPELL, MT	to
				Class A station status.
OH	BLTTA-20010710ABJ	WBKA-LP 1104	CRAWFORD BROADCASTING CO., INC.	Application to convert: BLTTTL -1989
	E	CHAN-22	BUCYRUS, OH	to
				Class A station status.
PA	BLTTA-20010711AEF	WLLS-LP 208	LARRY L. SCHRECONGOST	Application to convert: BLTTTL -1996
	P	CHAN-49	INDIANA, PA	to
				Class A station status.
NY	BLTVA-20010712ADA	WBLZ-LP 14320	RENARD COMMUNICATIONS CORP.	Application to convert: BLTVL -1998
	E	CHAN-13	SYRACUSE, NY	to
				Class A station status.

Certificate of Service

I, Yvette J. Graves, hereby certify that on this 4th day of April, 2005, copies of the foregoing "Comments In Opposition to Notice of Proposed Rule Making" have been served by U.S. first-class mail, postage prepaid to the following:

Howard Jaeckel, Esq.
CBS Broadcasting, Inc.
1515 Broadway, 49th Floor
New York, NY 10036

*Pamela Blumenthal
Federal Communications Commission
445 12th Street, S.W., Room 2-A762
Washington, D.C. 20554



Yvette J. Graves

*Via Hand Delivery